

**FRIEDMAN, JAMES & BUCHSBAUM LLP**

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X		22 cv-958
JAMES YOUNG, JR.	:	<b>PLAINTIFF DEMANDS</b>
	:	<b>A TRIAL BY JURY</b>
Plaintiff,	:	
	:	<b><u>COMPLAINT</u></b>
-against-	:	
	:	<b>SEAMAN'S CASE UNDER</b>
GREAT LAKES DREDGE & DOCK	:	<b>THE JONES ACT FOR</b>
COMPANY, LLC,	:	<b><u>PERSONAL INJURIES</u></b>
	:	
Defendant.	:	
-----X		

**SUIT UNDER SPECIAL RULE FOR SEAMEN TO SUE  
WITHOUT SECURITY OR PREPAYMENT OF FEES  
FOR THE ENFORCEMENT OF THE LAWS OF THE  
UNITED STATES, COMMON AND STATUTORY FOR  
THE PROTECTION OF AND FOR THE HEALTH AND  
SAFETY OF SEAMEN AT SEA**

Plaintiff, JAMES YOUNG, JR., complaining of the defendant GREAT LAKES  
DREDGE & DOCK COMPANY, LLC, by his attorneys FRIEDMAN, JAMES &  
BUCHSBAUM LLP, respectfully alleges upon information and belief as follows:

**Jurisdictional & Venue Statement:**

1. This Court's subject matter jurisdiction is premised upon the Jones Act, 46 U.S.C §§ 30104 *et seq.* (formerly codified at 46 U.S.C. § 688) and the general maritime law of the United States.

2. Venue is premised upon 45 U.S.C. § 56, as incorporated by the Jones Act, inasmuch as defendant is transacting business within the Southern District of New York and maintains an agent for service of process within the Southern District of New York.

**Parties:**

3. At all relevant times, plaintiff JAMES YOUNG, JR. was and still is a citizen and resident of the State of Virginia.

4. At all relevant times, defendant GREAT LAKES DREDGE & DOCK COMPANY, LLC was and still is a corporation organized and existing pursuant to the laws of Delaware authorized to transact business and transacting business in the State of New York with a registered agent for the service of process within the City of New York, County of New York.

**FIRST COUNT**

5. At all relevant times, defendant owned the Booster Barge REGGIE and Dredge ILLINOIS.

6. At all relevant times, defendant operated the Booster Barge REGGIE and Dredge ILLINOIS.

7. At all relevant times, defendant controlled the Booster Barge REGGIE and Dredge ILLINOIS.

8. That at all times and dates hereinafter mentioned, the plaintiff was a seaman and member of the crew of the Booster Barge REGGIE and Dredge ILLINOIS and an employee of defendant.

9. That on or about February 11, 2019, while within navigable waters, in or about Gilgo Beach, Babylon, New York without any fault on the part of the plaintiff, and wholly and solely by reason of the negligence, recklessness and carelessness of defendant, and its agents, servants and/or employees, and by reason of the unseaworthiness of Booster Barge REGGIE and Dredge ILLINOIS and its and their equipment, appurtenances, tackle and crew, plaintiff was caused to sustain severe and permanent personal injuries when the dredge pump Vic-Ring coupling and its fasteners on the Booster Barge REGGIE failed.

10. As a result of the foregoing, the plaintiff was rendered sick, sore, lame and disabled and sustained severe and permanent personal injuries including, but not limited to, his eyes and face, was and is psychologically disabled causing him to suffer pain, and for a time he is prevented from attending to his daily labors, thereby losing sums of money which he otherwise would have earned as wages, and has endeavored to be cured of his injuries, and has expended sums of money to maintain himself, and will continue to endure pain and suffering, all to his damage.

11. By reason of the foregoing, plaintiff has been damaged in the sum of THREE MILLION (\$3,000,000.00) DOLLARS.

**SECOND COUNT**

12. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 11 as if set forth fully at length herein.


13. Plaintiff is entitled to maintenance, cure, and medical expenses for the period that he was disabled and unable to work in the total sum of TWO HUNDRED THOUSAND (\$200,000.00) DOLLARS.

**WHEREFORE**, plaintiff JAMES YOUNG, JR. demands judgment against defendant GREAT LAKES DREDGE & DOCK COMPANY, LLC on the First Count in the amount of THREE MILLION (\$3,000,000.00) DOLLARS; and against defendant GREAT LAKES DREDGE & DOCK COMPANY, LLC on the Second Count in the amount of TWO HUNDRED THOUSAND (\$200,000.00) DOLLARS, together with the costs, interest and disbursements of this action, and such other and further relief as this Court deems just and proper.

Dated: New York, New York  
February 3, 2022

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